

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

LIMOLINER, INC., )  
Plaintiff, )  
 )  
V. ) C.A. NO: 1:11-CV-11877-JCB  
 )  
DATTCO, INC., )  
Defendant. )

**AFFIDAVIT OF COUNSEL IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Christopher S Williams, do hereby under oath declare and say as follows:

1. I am counsel for the defendant herein;
2. Attached hereto as Exhibit 1 are true and accurate copies of pages 1, 7, 18, 24, 25, 31, 32, 57, 58, 60, 61, 70, 72, 75-77, 89 and 90 from the transcript of the deposition of Fergus McCann;
3. Attached hereto as Exhibit 2 are true and accurate copies of pages 1, 21, 25, 29, 33, 34, 35, 48, 49, 56, 58, 59, 64-66, 73, 74, 77-80, 82-84, 86-91, 94, 98, 106-111, 119, 120-122, 134-136, 147 and 148 from the transcript of the deposition of Stephen Connolly;
4. Attached hereto as Exhibit 3 are true and accurate copies of pages 1, 46, 56, 68, 69, 74, 100, 111, 112, and 135 from the transcript of the deposition of Robert Hazel;
5. Attached hereto as Exhibit 4 is a true and accurate copy of Exhibit 7 from the deposition of Stephen Connolly;
6. Attached hereto as Exhibit 5 are true and accurate copies of pages 1-2 and 177-181 from the transcript of the deposition of Edward Corr;

7. Attached hereto as Exhibit 6 is a true and accurate copy of Exhibit 28 from the deposition of Edward Corr;
8. Attached hereto as Exhibit 7 is a true and accurate copy of Exhibit 3 from the deposition of Stephen Connolly;
9. Attached hereto as Exhibit 8 are true and accurate copies of pages 1, 33-35, 40-45, 48-50, 51-52 and 56 from the deposition of Michael Shaughnessy;
10. Attached hereto as Exhibit 9 is a true and accurate copy of Exhibit 1 from the deposition of Stephen Connolly;
11. Attached hereto as Exhibit 10 is a true and accurate copy of Exhibit 2 from the deposition of Stephen Connolly;
12. Attached hereto as Exhibit 11 is a true and accurate copy of Exhibit 4 from the deposition of Stephen Connolly;
13. Attached hereto as Exhibit 12 is a true and accurate copy of Exhibit 8 from the deposition of Robert Hazel;
14. Attached hereto as Exhibit 13 is a true and accurate copy of a letter from Stephen Connolly to Dattco, dated August 8, 2011;
15. Attached hereto as Exhibit 14 are true and accurate copies of Exhibits 19 and 20 from the deposition of Robert Hazel; and,
16. Attached hereto as Exhibit 15 is a true and accurate copy of a letter from James Singer, Esq., to Bruce Gray of Dattco, dated September 1, 2011.

Signed under the penalties of perjury this 9th day of August 2013.

/s/ Christopher S. Williams  
Christopher S. Williams (BBO# 528465)  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants has identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 9, 2013.

/s/ Christopher S. Williams  
Christopher S. Williams (BBO# 528465)